

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 1:23-cv-22747-RKA/Reid

JAMES TUNDIDOR, SR.,
DULCE E. TUNDIDOR,
JAMES TUNDIDOR, JR.
and PORKY'S CABARET,
INC. d/b/a BELLAS CABARET,

Plaintiffs,

vs.

CARLOS HERNANDEZ and
CITY OF HIALEAH,

Defendants.

**PLAINTIFFS' NOTICE OF ISSUES TO BE DISCUSSED AT
DISCOVERY HEARING ON JUNE 4, 2025 [ECF 167]**

Plaintiffs, JAMES TUNDIDOR, SR. ("James, Sr."), DULCE E. TUNDIDOR ("Dulce"), JAMES TUNDIDOR, JR. ("James, Jr." and together with James, Sr. and Dulce, collectively, the "Tundidors"), and PORKY'S CABARET, INC. d/b/a BELLAS CABARET ("Bellas," and together with the Tundidors, the "Plaintiffs"), by and through undersigned counsel, hereby file this notice of issues to be discussed at the discovery hearing scheduled for Wednesday, June 4, 2025 at 2:30 p.m for one hour [ECF 167], in connection with the following:

1. *Plaintiffs' Objections to Defendant Carlos Hernandez's Third-Party Amended Subpoena to AT&T, Inc.* for four years' worth of Non-Party Jesus Tundidor's telephone records;
2. *Non-Party Jesus Tundidor's Objections to Defendant Carlos Hernandez's Third-Party Amended Subpoena to AT&T, Inc.* for four years' worth of Councilman Jesus Tundidor's telephone records;
3. *City of Hialeah's Objections to Plaintiffs' Third-Party Subpoenas to AT&T, Verizon, and*

T-Mobile for the City of Hialeah's Building Official, Alexis Riveron's phone records for a period of two weeks prior to and following the 2019 Raid and for a two-week period in December 2019; and

4. *City of Hialeah's Objections to Plaintiffs' Third-Party Subpoena to the Jorge Colina Group, LLC* for information relating to Plaintiffs, the Raid, and key parties in this case.

Dated: June 3, 2025.

Respectfully submitted,

/s/ Lissette M. Carreras

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Dulce Tundidor, James Tundidor Jr., Porky's

Cabaret, Inc. d/b/a Bellas Cabaret

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Court's CM/ECF system which will provide automatic electronic service on those parties registered to receive notifications on June 3, 2025.

By: /s/ Lissette M. Carreras
Lissette M. Carreras, Esq.